

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

*As representative of*

COMMONWEALTH OF PUERTO RICO  
*ET AL.*  
Debtor

Bcy. No. 17-03283-LTS  
Jointly administered  
TITLE III, PROMESA ACT

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THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

*As representative of*

EMPLOYEES RETIREMENT SYSTEMS OF  
THE GOVERNMENT OF THE COMMONWEALTH  
OF PUERTO RICO (“ERS”)

Bcy. No. 17-3566-LTS  
(Joint Administration  
Requested)

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THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

*As representative of*

PUERTO RICO HIGHWAY AND  
TRANSPORTATION AUTHORITY  
Debtor

Bcy. No. 17-03567-LTS  
TITLE III, PROMESA ACT  
(Joint Administration  
Requested)

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MOTION FOR ENLARGEMENT OF TIME TO RESPONDE TO FINANCIAL  
OVERSIGHT BOARD REPLY TO MOTION TO REVIEW AND STAY DEBTOR'S  
REPRESENTATIVE

TO DEPRIVE THE COMMONWEALTH OF INTERNAL REVENUE  
(REFILED AS PERMITED)

TO THE HONORABLE COURT:

NOW COME InterAmericas Turnkey, Inc.<sup>1</sup>, through undersigned counsel, and respectfully states and prays:

1.- Debtor's representative in these cases: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO (hereinafter the "BOARD") replied to appearing party motion docket No. 1167 of the main case 17bk03283-LTS.

2.- Undersigned has not been able to respond to the Financial Oversight Board's reply to our motion due to the effects of hurricane Irma. I was without water and electricity at home until last Tuesday, and without internet service up to today. The electricity returned to the office where the secretary is located today. I have put into service a mobile hotspot to be able to use adequately the internet (I have been able to see the docket entries in my cellular telephone after the service was restored, but not to see the documents). Today the electricity is back in service in the office.

3.- Unfortunately, Puerto Rico faces a second major hurricane (María), and I have had to renew preparations at home for a probable major hit of said hurricane. (I hope that the impact be not so hard as projected).

4.- At this time I do not honestly know when I will be back to normal operations, it will depend upon the results of the passage of María over or near Puerto Rico.

IT IS THEREFORE respectfully requested that this Honorable Court GRANT an extension of time to respond to the reply filed by the the Oversight Board, for a term to be determined by the Honorable Court depending upon the effects of hurricane María in Puerto Rico.

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<sup>1</sup> Eminent domain creditor of the Puerto Rico Highways and Transportation Authority, that has appeared in Bcy. No. 17-3567-LTS.

In San Juan, Puerto Rico, this 18<sup>th</sup> day of September, 2017.

/s/MAXIMILIANO TRUJILLO-GONZALEZ, ESQ.

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#### CERTIFICATE OF SERVICE

The present document shall be sent, via the electronic system of the Clerk of the U.S. Bankruptcy Court, to attorneys for petitioner: Mr. Hermann D. Bauer-Alvarez, Esq., O'Neill & Borges, [Hermann.bauer@oneillborges.com](mailto:Hermann.bauer@oneillborges.com), and Mr. Martin J. Bienenstock, Esq., Proskauer Rose LLP, [mbienenstock@proskauer.com](mailto:mbienenstock@proskauer.com); and to Ms. Monsita Lecaroz, Esq., Office of the United States Trustee, Puerto Rico Division; and all other parties in the electronic system of the U.S. Bankruptcy Court.

At this time I do not have the facilities to notify those parties included in the master address list, and not included among the parties notified by the Clerk of the Court's electronic system.

In San Juan, Puerto Rico, this 18<sup>th</sup> day of September, 2017.

/s/Maximiliano Trujillo-González, Esq.